

AARON D. FORD
Attorney General
LAURA M. GINN, Bar No. 8085
Deputy Attorney General
State of Nevada
100 N. Carson Street
Carson City, Nevada 89701-4717
Tel: (775) 684-1120
E-mail: lginna@ag.nv.gov

*Attorneys for Defendants Carol Alley, M.D.,
Lidia Karina Gamarra-Hoff, Benjamin Murphy
and Martin J. Naughton, M.D.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

WILLIAM E. HARRIS,

Plaintiff,

v.

H. WICKHAM, *et al.*,

Defendants.

Case No. 3:20-cv-00557-MMD-CSD

**STIPULATION AND ORDER FOR
EXTENSION OF TIME**

Defendants Carol Alley, M.D., Lidia Karina Gamarra-Hoff, Benjamin Murphy and Martin J. Naughton, M.D., (herein NDOC Employees), by and through counsel, Aaron D. Ford, Nevada Attorney General, and Laura M. Ginn, Deputy Attorney General, of the State of Nevada, Office of the Attorney General, and Plaintiff William E. Harris, by and through counsel, Travis N. Barrick, Esq., of the law firm of Gallian Welker & Associates, LC., hereby submit their thirty-two day stipulation to extend the time to file a response to the Plaintiff's Motion for Order to Show Cause (ECF No. 69) and Motion for Order of Contempt (ECF No. 70) (Motions).

MEMORANDUM OF POINTS AND AUTHORITIES

Courts have inherent powers to control their dockets, *see Ready Transp., Inc. v. AAR Mfg, Inc.*, 627 F.3d 402, 404 (EDCA 2008), and to "achieve the orderly and expeditious disposition of cases." *Chambers v. NASCO, Inc.*, 501 U.S. 32, 43 (1991) "Such power is indispensable to the court's ability to enforce its orders, manage its docket, and regulate

insubordinate [] conduct. *Id.* (See also *Mazzeo v. Gibbons*, No. 2:08-cv-01387-RLH-PAL, 2010 WL 3910072, at *2 (D.Nev.2010)).

LR IA 6-1 discusses requests for continuances. The rule states:

(a) A motion or stipulation to extend time must state the reasons for the extension requested and must inform the court of all previous extensions of the subject deadline the court granted. (Examples: "This is the first stipulation for extension of time to file motions." "This is the third motion to extend time to take discovery.")

This is NDOC Employees' second request and is requested for good cause. Defense Counsel needs to contact individuals to complete research to respond to Plaintiff's Motions. A thirty-two day extension should allow for these activities to be completed to **April 24, 2023**.

The parties hereby further stipulate and agree that the above stipulations are made in good faith and not for the purposes of delay.

DATED this 20th day of March 2023.

DATED this 20th day of March 2023.

GALLIAN WELKER & ASSOCIATES, LC

AARON D. FORD
Attorney General

By: /s/ Travis N. Barrick
TRAVIS N. BARRICK, Bar No. 9257
Attorneys for William Harris
Appointed under Pro Bono Program

By: /s/ Laura M. Ginn
LAURA M. GINN, Bar No. 8085
Deputy Attorney General
Attorneys for Defendants

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: March 21, 2023